IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, vs. DAVID RAY NELSON, Defendant.	)))))))))	Case No. 4:16-cr-179 DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW, the Defendant, through undersigned counsel, and requests the Court modify his conditions of pretrial release to allow him to visit his brother and sister in Cedar Falls, IA.

1. Mr. Nelson was charged on November 21st, 2016 to one count of Receipt of Visual Depictions of Minors Engaging in Sexually Explicit Conduct, violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 2256; and one count of Possession of Child Pornography, violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2), and 2256.
2. Mr. Nelson is currently out of custody on pretrial release.
3. Mr. Nelson is monitored on release by Doug Statler at the US Probation Office.
4. Mr. Nelson's brother and sister live in Cedar Falls, Iowa.
5. Mr. Nelson would like to be able to travel to Cedar Falls, Iowa, to visit his brother and sister for the Holiday. His preferred travel plans would be to depart on December 23, 2016, for Cedar Falls with his parents, and return to Moravia on December 26, 2016.

6. Counsel has conferred with Doug Statler, who indicates he does not have any objection to Mr. Nelson travelling to Cedar Falls.
7. Undersigned counsel tried to contact Mr. Wendel, Assistant Attorney General, but has not heard back regarding his position on the motion.

WHEREFORE, Mr. Nelson requests the court modify the conditions of his pretrial release so as to allow him to travel to Cedar Falls for the days of December 23rd, 2016 to December 26, 2016 to visit his brother and sister.

/s/ Angela L. Campbell
Angela L. Campbell AT# 0009086
DICKEY & CAMPBELL LAW FIRM, P.L.C.
301 E. Walnut St., Suite 1
Des Moines, Iowa 50309
PHONE: 515.288.5008
FAX: 515.288.5010
E-MAIL: angela@dickeycampbell.com

CERTIFICATE OF SERVICE
I hereby certify that on December 22, 2016, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.
/s/ Angela Campbell